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11 **UNITED STATES DISTRICT COURT**  
12 **DISTRICT OF NEVADA**  
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15 SECURITIES AND EXCHANGE  
16 COMMISSION,

17 Plaintiff,

18 vs.

19 BANC DE BINARY LTD, OREN  
20 SHABAT LAURENT (f/k/a OREN  
21 SHABAT), ET BINARY OPTIONS LTD.,  
22 BO SYSTEMS LTD. SEYCHELLES and  
BDB SERVICES LTD. SEYCHELLES,

23 Defendants.  
24

Case No.: 2:13-cv-00993-RCJ-VCF

**STIPULATION AND ~~[PROPOSED]~~ ORDER  
FOR MODIFICATIONS TO SCHEDULING  
ORDER**

**Stipulation and ~~[Proposed]~~ Order for  
Extension Of Time  
(second request)**

25 WHEREAS, Plaintiff Securities and Exchange Commission (the “SEC”) filed its initial  
26 Complaint against Defendant Banc de Binary Ltd (“BdB Ltd”) on June 5, 2013;

27 WHEREAS, the Court entered a Joint Discovery Plan and Scheduling Order on August  
28 27, 2013 (Dkt. No. 36) (the “Scheduling Order”);

1 WHEREAS, the SEC filed a First Amended Complaint against BdB Ltd and Oren Shabat  
2 Laurent on January 16, 2014;

3 WHEREAS, upon stipulation of the parties, the Court entered a revised Scheduling Order  
4 on February 14, 2014 (Dkt. No. 51) (the “Revised Scheduling Order”);

5 WHEREAS, the SEC filed a Second Amended Complaint against BdB Ltd, Oren Shabat  
6 Laurent, ET Binary Options Ltd., BO Systems Ltd. Seychelles, and BDB Services Ltd.  
7 Seychelles on March 11, 2014;

8 WHEREAS, Oren Shabat Laurent filed his answer to the Second Amended Complaint on  
9 April 7, 2014, and the entity defendants—BdB Ltd, ET Binary Options Ltd., BO Systems Ltd.  
10 Seychelles, and BDB Services Ltd. Seychelles—filed their answer to the Second Amended  
11 Complaint on April 23, 2014;

12 WHEREAS, counsel for the SEC and counsel for the defendants have been working  
13 together in connection with the written discovery, document productions and depositions in the  
14 case as to, among other things, the parties added to the case by the Second Amended Complaint;

15 WHEREAS, the SEC took the depositions of Oren Shabat Laurent, the Rule 30(b)(6)  
16 designees of the entity defendants and Yehezkel Shabat during the week of July 7, 2014;

17 WHEREAS, the parties have recently resolved some outstanding discovery disputes—as  
18 to, among other things, the parties recently added to the case—the complexity of which has been  
19 heightened in part by the location of many of the discovery materials in foreign locales;

20 WHEREAS, the parties’ resolution of those outstanding discovery disputes, despite the  
21 parties’ efforts, was not achieved prior to the expiration of the 21-day period under Local Rule  
22 26-4 within which to request an extension of the scheduling order;

23 WHEREAS the parties were nonetheless able to resolve these issues without the  
24 intervention of the Court;

25 WHEREAS, the parties have met and conferred, and agree to, and respectfully request,  
26 the following modifications to the Scheduling Order to ensure time for the parties to address  
27 these recently resolved issues; and

28 WHEREAS, this is the parties’ second request to modify the Scheduling Order;

1           FOR THE REASONS SET FORTH ABOVE, IT IS HEREBY STIPULATED, by and  
2 among counsel for the parties as follows:

3           1.     The parties stipulate and agree to the following changes to the Revised  
4 Scheduling Order:

5                 a.     The discovery cut-off date shall be extended from July 18, 2014 to  
6 September 19, 2014. *See* Dkt. No. 51 (Scheduling Order) at 3.

7                 b.     The cut-off for written discovery shall be extended from July 18, 2014 to  
8 September 19, 2014. *See id.*

9                 c.     The cut-off for oral discovery shall be extended from July 18, 2014 to  
10 September 19, 2014. *See id.*

11                d.     The due date for dispositive motions shall be extended from August 15,  
12 2014 to October 10, 2014. *See id.*

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e. The due date for the joint pre-trial order shall be extended from September 19, 2014 to November 14, 2014. *See id.*

Dated: July 11, 2014

Dated: July 11, 2014

/s/ Amy J. Longo  
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*Attorneys for Defendants*

IT IS SO ORDERED.

Dated: 7-14-2014



The Honorable Cam Ferenbach  
United States Magistrate Judge

**PROOF OF SERVICE**

I am over the age of 18 years and not a party to this action. My business address is:

U.S. SECURITIES AND EXCHANGE COMMISSION,  
5670 Wilshire Boulevard, 11th Floor, Los Angeles, California 90036-3648  
Telephone No. (323) 965-3213; Facsimile No. (323) 965-3908.

On July 11, 2014, I caused to be served the document entitled **STIPULATION AND [PROPOSED] ORDER FOR MODIFICATIONS TO SCHEDULING ORDER**

on all the parties to this action addressed as stated on the attached service list:

☐ **OFFICE MAIL:** By placing in sealed envelope(s), which I placed for collection and mailing today following ordinary business practices. I am readily familiar with this agency's practice for collection and processing of correspondence for mailing; such correspondence would be deposited with the U.S. Postal Service on the same day in the ordinary course of business.

☐ **PERSONAL DEPOSIT IN MAIL:** By placing in sealed envelope(s), which I personally deposited with the U.S. Postal Service. Each such envelope was deposited with the U.S. Postal Service at Los Angeles, California, with first class postage thereon fully prepaid.

☐ **EXPRESS U.S. MAIL:** Each such envelope was deposited in a facility regularly maintained at the U.S. Postal Service for receipt of Express Mail at Los Angeles, California, with Express Mail postage paid.

☐ **HAND DELIVERY:** I caused to be hand delivered each such envelope to the office of the addressee as stated on the attached service list.

☐ **UNITED PARCEL SERVICE:** By placing in sealed envelope(s) designated by United Parcel Service ("UPS") with delivery fees paid or provided for, which I deposited in a facility regularly maintained by UPS or delivered to a UPS courier, at Los Angeles, California.

☐ **ELECTRONIC MAIL:** By transmitting the document by electronic mail to the electronic mail address as stated on the attached service list.

☒ **E-FILING:** By causing the document to be electronically filed via the Court's CM/ECF system, which effects electronic service on counsel who are registered with the CM/ECF system.

☐ **FAX:** By transmitting the document by facsimile transmission. The transmission was reported as complete and without error.

I declare under penalty of perjury that the foregoing is true and correct.

Date: July 11, 2014

/s/ Amy J. Longo

Amy J. Longo

**SEC v. Banc de Binary Ltd, et al.**  
**United States District Court – District of Nevada**  
**Case No. 2:13-cv-00993-RCJ-VCF**

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